

APPENDIX C

ESH&Q ORGANIZATIONAL STRUCTURE, ROLES, RESPONSIBILITIES

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APPENDIX C

ESH&Q ORGANIZATIONAL STRUCTURE, ROLES, RESPONSIBILITIES

1.0 FDH ESH&Q

FDH ESH&Q provides the PHMC Team policies, procedures, and guidance necessary for consistent application of ESH&Q requirements, thereby enabling the flow-down of appropriate standards and requirements to the Major Subcontractors and to lower tiered subcontractors. FDH ESH&Q serves as the integrator of all ESH&Q activities on the PHMC Scope and ensures a coordinated approach to ESH&Q issues. FDH ESH&Q supports the DOE-RL Office of ES&H in providing primary interface with regulators, particularly in the areas of environmental compliance and permitting.

2.0 MAJOR SUBCONTRACTOR ES&H ORGANIZATION

The majority of PHMC Team ES&H professionals are employed by the Major Subcontractors and work directly on projects. Major Subcontractors maintain an ES&H organization to support and communicate with its respective line organizations. Each Major Subcontractors has a defined scope of work, primarily related to major project areas as defined in the PHMC. Major Subcontractors are required, by their contract with FDH, to develop implementing mechanisms for the expectations of the Project Hanford ISMS Plan. The Major Subcontractors are required by their contract with FDH to flow down applicable requirements and Project Hanford implementing procedures to lower tiered subcontractors consistent with the facility's Authorization Envelope.

3.0 ES&H INTEGRATION COMMITTEES

FDH maintains Presidents' Zero Accident Council to ensure integration of ES&H activities throughout the projects. The Presidents' Zero Accident Council works to improve the health and safety of PHMC Team employees and visitors by demonstrating commitment to affect positive change through the ISMS and the DOE VPP by providing the leadership to influence positive behavior and continual improvement toward the achievement of zero accidents. FDH's management commitment to ES&H is demonstrated by the senior-level participation on this council. Table C-1 specifies the membership and function of the Presidents' Zero Accident Council.

Attachment 1 describes FDH responsibilities.

Table C-1. Presidents' Zero Accident Council.

Membership	Function
<ul style="list-style-type: none"> • FDH Facilitator (Occupational Safety & Health Director) • Co-Chairs (FDH, Hanford Atomic Metal Trades Council, and Hanford Guards Union-Presidents) • Project Hanford Management Contract (PHMC) Presidents and ES&H Managers representing the Major Subcontractors • Bargaining unit and non-represented employees from each Project Hanford company-level employee Zero Accident Council • FDH Industrial Relations <p>(Although not charter members, DOE-RL ES&H, the OMC, and other prime contractors have a standing invitation to participate.)</p>	<ul style="list-style-type: none"> • Conduct monthly meetings using established and published agenda, and distribute meeting minutes (reports). • Develop an organization charter and review annually to evaluate effectiveness. • Provide an open forum to exchange information and ideas relative to safety and health. • Create the vision and direction for operating within the ISMS. • Establish ad hoc/steering committees, as appropriate, to develop recommended solutions to identified issues. • Develop clear and specific performance-based safety and health goals, as well as activity objectives; periodically status progress. • Address issues brought forward from the employee Zero Accident Council in a timely manner. • Promote Zero Accident Council participation in safety and health-related benchmarking activities. • Recognize outstanding safety performance through the FDH "Zero Accident Program." • Establish a method to recognize significant safety and health achievements. • Communicate near-miss and lessons learned data to prevent recurrence of incidents at other Project Hanford projects/facilities. • Present Project Hanford safety performance indicator updates monthly. • Periodically request input from employee Zero Accident Council on progress toward VPP initiatives.

ATTACHMENT C-1

DESCRIPTION OF RESPONSIBILITIES FLUOR DANIEL HANFORD OFFICE OF ENVIRONMENT, SAFETY, HEALTH AND QUALITY

FDH ESH&Q establishes the PHMC Team ESH&Q perspective and sets the framework for all ESH&Q activities that occur within the PHMC Scope by providing the following:

- Policy and guidance consistent with DOE-RL requirements necessary for application of ESH&Q requirements, thereby enabling the flow down of requirements to the Major Subcontractors responsible for their respective projects and activities
- Prepares and maintains the Project Hanford ISMS Plan, and supports and serves as Technical Authority of ISMS
- Review and approval of certain activities carried out by the Major Subcontractors, such as approval of the project-specific Authorization Bases
- Technical expertise to assist and support line organizations and to supplement a variety of assessment and corrective teams
- Oversight of Major Subcontractor implementation of Project Hanford ESH&Q policies and procedures to ensure appropriate consistency, accountability, and compliance.
- Coordination with other prime contractors on sitewide ESH&Q issues.

More specifically, FDH ESH&Q provides the functional capabilities and performs the following roles and responsibilities.

C.1 Occupational Safety and Health (OS&H)

FDH ESH&Q is responsible for establishing the PHMC Team standards and directives used to recognize, evaluate, and control physical hazards, chemical exposures, and fire loss that could result in adverse effects on human health and property. The following activities are performed:

- Developing and measuring the mechanisms used by management to visibly demonstrate its commitment to the safety and health of the PHMC Team workforce
- Promoting ownership of the safety program through supported employee involvement in local and FDH Zero Accident Councils, participation in the JHAs, and active participation in the recognition and control of workplace hazards
- Ensuring PHMC Team compliance with the OS&H program through work site analysis and hazard prevention and control through Project Hanford implementing procedures
- Assisting QA in conducting performance assessments of OS&H programs and providing technical support for independent assessments

- Establishing standards and directives, and maintaining oversight of programs to ensure OS&H consistency, accountability, and compliance. These programs include, but are not limited to, the following:
 - Occupational Safety Program
 - Zero Accident Program
 - Industrial Hygiene Program
 - Medical Surveillance Plan
 - Fire Protection Engineering
 - Energy Isolation (Lock & Tag)
 - Confined Space Entry
 - Enhanced Work Planning Initiative
 - Respiratory Protection
 - Fire Department Emergency Response
 - Voluntary Protection Program

C.2 Emergency Preparedness

FDH ESH&Q is responsible for establishing an Emergency Management System including planning, preparedness, and readiness assurance for response to emergency events on the Hanford Site and provides emergency management support to DOE-RL. The following activities are performed:

- Developing and maintaining sitewide policies and procedures established for Emergency Preparedness and emergency response readiness
- Providing guidance to implement Emergency Preparedness programs
- Overseeing implementation of Emergency Preparedness and occurrence reporting programs and event notification processes
- Performing assessments of Emergency Preparedness programs and providing technical support for independent assessments.

C.3 Nuclear Safety and Work Controls

FDH ESH&Q provides guidance, policy, and direction to the PHMC Team to ensure the appropriate work controls are communicated to the projects. FDH ESH&Q provides technical guidance and input, as needed, to the PHMC Team to meet or interpret the defined requirements. FDH ESH&Q also serves as the primary PHMC Team interface with the DOE-RL on Project Hanford policies and DOE-RL expectations for the following:

- Authorization Basis documents
- ES&H requirements identification
- DNFSB activities.

In the area of nuclear safety FDH ESH&Q is responsible for the following activities:

- Identifying, evaluating, and interpreting requirements applicable to PHMC Team activities affecting nuclear safety

- Developing and maintaining policies and procedures for implementing relevant nuclear safety requirements
- Participating in and maintaining cognizance of nuclear safety activities of PHMC Team organizations
- Assisting PHMC Team to develop facility-specific nuclear safety programs based on established Project Hanford policies and procedures
- Providing guidance to PHMC Team in establishing their nuclear safety nuclear facility Authorization Bases, and providing technical support in reviewing Authorization Basis documents for implementation of DOE-RL directives and expectations
- Maintaining a current list of Authorization Basis documents for PHMC Team nuclear facilities
- Providing assistance to PHMC Team for the safety of packaging and transportation of nuclear and other hazardous materials including waste
- Reviewing SARs for Packaging and Safety Evaluations for Packaging and other related documents affecting the safety of packaging and transportation of nuclear and other hazardous materials including waste
- Developing and maintaining Project Hanford policies and procedures for preparation and submittal of PHMC Team implementation plans for new DOE Nuclear Safety Rules as these are issued
- Developing and maintaining Project Hanford policies and procedures for identification, review, evaluation, and reporting of potential noncompliances with DOE Nuclear Safety Rule requirements and related PHMC Team implementation plans, and compliance and consent orders
- Interfacing with FDH interpretive authorities who determine whether reported potential noncompliances are in fact noncompliances and determining acceptability of proposed corrective action plans for significant noncompliances before the plans are submitted to DOE-RL
- Determining the nuclear safety significance of actual noncompliances and entering significant noncompliances into the DOE-HQ Noncompliance Tracking System (NTS)
- Maintaining PHMC Team database for noncompliances that are determined to be minor and not reported into the NTS
- Preparing and maintaining validation packages for PHMC Team enforcement related correspondence including documentation to support closure of corrective action plans in the NTS
- Developing and maintaining Project Hanford policies and procedures for the conduct of operational readiness reviews and providing staffing or oversight assistance to PHMC Team for such reviews
- Interfacing with the DOE-RL DNFSB Liaison Office and providing support as needed including coordinating DNFSB visits and PHMC Team responses to their recommendations and information requests, and tracking status of completion of DNFSB commitments for nuclear safety related items
- Maintaining cognizance of DNFSB concerns at other DOE sites and evaluating applicability to the Hanford Site.

C.4 Environmental Protection

FDH ESH&Q is responsible for the following:

- Setting environmental policy, expectations, and standards for the PHMC Team
- Directing, coordinating, and managing the integration of contractor and subcontractor environmental operations including integration of FDH environmental committees
- Serving as the single FDH point of contact with DOE-RL and regulators on environmental issues
- Identifying, reviewing, and interpreting new, existing, or proposed environmental requirements
- Reviewing and approving regulatory documents from Major Subcontractors before submittal to DOE-RL/regulators
- Administering the Hanford Environmental Compliance Program
- Coordinating resolution of regulatory inspections, spill release and permit reporting, and noncompliances
- Coordinating implementation of chemical management requirements.

C.5 Radiation Protection

FDH ESH&Q provides oversight and develops policies and procedures to ensure the use of contamination control and exposure control practices that minimize personnel exposure to internal and external radiation. The major activities are as follows:

- Supporting line management and the FEB in reviewing documents, operations, programs, and activities for radiological safety compliance
- Providing oversight for compliance with Radiation Protection requirements
- Assisting line organizations with specifications, work packages, occurrence reports, corrective action plans, procurement documents, hazard evaluations, risk analysis, and self-assessments
- Assisting line organizations with the development of strategic plans, procedures, goals, initiatives, and performance measures to improve radiological performance
- Assisting with trend analysis and data interpretation to improve performance
- Providing direction to safety and health training
- Providing an effective internal and external dosimetry program
- Ensuring an accurate and retrievable exposure recordkeeping program
- Overseeing implementation of bioassay and instrument calibration programs

- Developing and maintaining the technical basis for sitewide Radiation Protection practices and procedures
- Providing interpretive authority assistance for 10 CFR 835
- Managing the content of training provided to Radiological Control Technicians and PHMC Team personnel directed by 10 CFR 835 and the Radiological Control Manual
- Assisting in the identification and communication of radiation protection lessons learned.

C.6 Integration

FDH ESH&Q provides sitewide integration and cross-cutting services for DOE-HQ, DOE-RL, PHMC Team, and other site contractors relative to ES&H workscope. FDH ESH&Q is responsible for the management of Tri-Party Agreement and the management of the ES&H Program Work Plans. Principal responsibilities and objectives are as follows.

- Reviewing and concurring with the technical approach and schedules for assigned Tri-Party Agreement milestones. Developing and maintaining (through formal change control) a baseline of the approach and schedule for the assigned milestones through completion
- Ensuring Contractors respond through appropriate channels to all correspondence from DOE-RL that requires actions related to assigned milestones
- Ensuring issues that might impact milestone baselines are resolved in a timely manner by working with the appropriate performing contractors
- Coordinating and integrating interaction with the EPA and Ecology regarding the Tri-Party Agreement
- Organizing and coordinating monthly meetings of the Tri-Party Agreement Inter-Agency Management Integration Team for DOE, EPA, and Ecology.
- Supporting the DOE-RL Tri-Party Agreement Project Manager as necessary to implement the Agreement. This includes logistics and technical support for all Tri-Party Agreement negotiations.